

In re:

**JOHN EDWARD LONG
737 MONROE STREET
CLARKSVILLE, TN 37040**

**CASE# 14-3936
CHAPTER 7
JUDGE LUNDIN**

**SSN: XXX-XX- 1604
DEBTOR.**

Adversary Case No.

JOHN EDWARD LONG, Debtor

Plaintiff.

VS.

PALISADES COLLECTION, LLC

Defendant.

COMPLAINT FOR TURNOVER AND DAMAGES

I. JURISDICTIONAL STATEMENT

1. This case relates to the bankruptcy case of In re: John Edward Long, Case No. 14-03936, filed in the United States Bankruptcy Court for the Middle District of Tennessee on May 16, 2014. This is a core proceeding.

2. Pursuant to 11 U.S.C. §105(a), this Court may issue any order, process or judgment necessary or appropriate to carry out the provisions of this title

II. DEBTOR'S AND PLAINTIFF'S CAUSE OF ACTION

1. The Debtor(s) filed for relief under a Chapter 7 Bankruptcy on May 16, 2014.
2. Palisades Collection, LLC had a garnishment against Debtor, John Edward Long, at that time.
3. Debtor's attorney has made multiple attempts to stop the garnishment of Debtor's wages since the filing date on May 16, 2014.
4. Nonetheless, Creditor has failed to stop and continues to fail to stop this garnishment even after Creditor has acknowledged through counsel that is has received notice of Debtor's Bankruptcy and that monies belonging to the Debtor would be returned.

WHEREFORE, PREMISES CONSIDERED, Debtor and Plaintiff prays:

1. That the Court Declare the Garnishment of Palisades Collection, LLC be terminated, and enjoin Palisades Collection, LLC from further actions to collect its debt.
2. That the Court award Debtor such monies that have already been taken out of his wages, as well as his attorneys fee and expenses as are incurred by him in this matter.
3. That the Court provide other relief as may be just and proper.

Date: July 28, 2014

Signature: /s/ Robert H. Moyer

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Certificate of Service

The undersigned hereby certifies that a copy of the foregoing Compliant was transmitted electronically by the CM/ECF system to the following on the 28th day of July 2014, John Edward Long, 737 Monroe Street, Clarksville, TN 37040; U.S. Trustee, 318 Customs House, 701 Broadway, Nashville, TN 37203; Chapter 13 Trustee, P.O. Box 340019, Nashville, TN 37203-0019 ; Palisades Collection, LLC, c/o David Mendelson, P.O. Box 17235, Memphis, TN 38187-0235; Palisades Collection, LLC, 210 Sylvan Ave., Englewood Cliffs, NJ 07632; and mailed to the Debtor at the address above and to the following affected parties on the 28th day of July 2014.

Signature: /s/ Robert H. Moyer
Robert H. Moyer